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JUN 15 2004

5 AT SEATTLE
6 CLERK U.S. DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 DEPUTY
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 UNITED STATES OF AMERICA,)
14 Plaintiff,)
15 v.)
16 JEFFREY SCOTT ABRAHAM,)
17 Defendant.)
18)
19 MAGISTRATE'S DOCKET
20 CASE NO. 04-365M
21)
22 COMPLAINT for VIOLATION
23 Title 18, United States Code,
24 Sections 922(g)(1)
25

26 BEFORE Mary Alice Thieler, United States Magistrate Judge, Seattle, Washington,
27 The undersigned complainant, being duly sworn on oath, states:

28 COUNT 1

19 (Felon in Possession of a Firearm)

20 On or about June 15, 2004, in Monroe, within the Western District of Washington,
21 JEFFREY SCOTT ABRAHAM, having been convicted of crimes punishable by
22 imprisonment for a term exceeding one year, that is, Bank Robbery in Federal District
23 Court for the Eastern District of Washington in 1998, did knowingly possess a firearm, to
24 wit: Smith and Wesson model 36 revolver, which had been shipped and transported in
25 interstate commerce.

26 All in violation of Title 18, United States Code, Section 922(g)(1) and 924(e)(1).



04-MJ-00365-CMP

1 And the complainant further states:

2 1. I am a Special Agent (SA) of the ATF. I am currently assigned to the ATF
3 Seattle, Washington Office. I have been employed in this capacity since January of
4 2001. In addition to being a graduate of the Federal Law Enforcement Training Center
5 and the ATF National Academy, I have received specialized training in the field of arson
6 and explosives, as well as numerous additional hours of classroom lecture regarding the
7 Federal firearm statutes. I have conducted numerous criminal investigations involving
8 violations of Federal firearms, explosives, arson and drug statutes. I have been the affiant
9 on numerous search warrants, assisted in the execution of many search warrants, utilized
10 informants, conducted undercover operations, conducted surveillance, examined
11 numerous arson and explosive scenes, and participated in the prosecution of numerous
12 individuals. I have in excess of six (6) years experience as a Federal Agent.

13 2. As a an agent with the ATF, I have been authorized to investigate potential
14 violations of Title 18, United States Code, Section 922(g)(1).

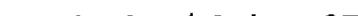
15 3. In 1998, the defendant, JEFFREY SCOTT ABRAHAM, was convicted of
16 one count of bank robbery in violation of 18, U.S.C.,§ 2113, in Federal District Court for
17 the Eastern District of Washington. The crime of bank robbery is punishable by more
18 than one year in prison. This conviction prohibits JEFFREY S. ABRAHAM from
19 possessing or receiving firearms or ammunition which have traveled in interstate
20 commerce under federal law.

21 4. On June 15, 2004, at approximately 11:00 am, the defendant met with
22 another individual and an undercover ATF special agent to obtain a firearm. The
23 meeting took place in the parking lot at Buzz Inn Steak house in Monroe, Washington.
24 The undercover agent gave the defendant a unloaded Smith and Wesson model 36
25 revolver which the defendant held in his hand. The defendant was immediately arrested
26 by ATF agents.

27

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1 5. I am aware that Smith and Wesson firearms are manufactured outside of
2 the State of Washington and therefore the firearm that the defendant possessed traveled
3 in interstate or foreign commerce to reach the State of Washington.

4 7. Based on the foregoing, your affiant submits that probable cause exists to
5 believe that JEFFREY SCOTT ABRAHAM committed a violation of Title 18 United
6 States Code, Section 922 (g)(1). 

~~CHRISTOPHER TAYLOR~~
~~Special Agent, ATF~~

Complaint and affidavit sworn to before me and subscribed in my presence, April 15, 2004.

MARY ALICE THIELER
UNITED STATES MAGISTRATE JUDGE